

217/782-2113

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT  
and  
TITLE I PERMIT<sup>1</sup>

PERMITTEE

Sweetheart Cup Company Inc.  
Attn: James Shine/Facility Service Supervisor  
7575 South Kostner Avenue  
Chicago, Illinois 60652

<u>Application No.:</u> 95120136	<u>I.D. No.:</u> 031600AIL
<u>Applicant's Designation:</u>	<u>Date Received:</u> May 14, 2001
<u>Operation of:</u> Paper and Plastic Food Container Manufacturing and Printing Facility	
<u>Date Issued:</u> February 3, 2004	<u>Expiration Date:</u> February 3, 2009
<u>Source Location:</u> 7575 South Kostner Avenue, Chicago, Cook	
<u>Responsible Official:</u> Dan Mitchell, Plant Manager	

This permit is hereby granted to the above-designated Permittee to OPERATE a Paper and Plastic Food Container Manufacturing and Printing Facility, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact Dan Punzak at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

DES:DGP:jar

cc: Illinois EPA, FOS, Region 1  
USEPA

<sup>1</sup> This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 - federal PSD and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

<sup>2</sup> Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

Sweetheart Cup Company, Inc.  
7575 South Kostner Avenue  
Chicago, Illinois 60652  
773/838-2533

I.D. No.: 031600AIL  
Standard Industrial Classification: 3082, Plastic Shapes  
2759, Printing (secondary)

1.2 Owner/Parent Company

Sweetheart Holdings  
10100 Reisterstown Road  
Owings Mills, Maryland 21117

1.3 Operator

Sweetheart Cup Company, Inc.  
7575 South Kostner Avenue  
Chicago, Illinois 60652

Dan Mitchell, Plant Manager  
773/38-2495

Environmental Contact  
James Shine, Facility Svcs Mgr  
773/838-2533

1.4 General Source Description

The Sweetheart Cup Company, Inc. is located at 7575 South Kostner Avenue in Chicago, Illinois. The source produces paper and plastic products. Plastic extruded products include straws, cups and various other shapes. Various customer specified designs are printed on the plastic substrates. Designs are also printed on paper substrates, which may then be cut, formed, glued, and wax coated depending on customer and product specifications.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

Act	Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAM	Compliance Assurance Monitoring
CAAPP	Clean Air Act Permit Program
CFR	Code of Federal Regulations
CO	Carbon Monoxide
ERMS	Emission Reduction Market System
°F	degrees Fahrenheit
ft <sup>3</sup>	cubic feet
gal	gallons
HAP	Hazardous Air Pollutant
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
kg	kilograms
kW	kilowatts
lb	pound
MG	megagrams
mmBtu	Million British thermal units
mo	month
MW-hr	megawatt hours
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM <sub>10</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration
psia	pounds per square inch absolute
RMP	Risk Management Plan
SO <sub>2</sub>	Sulfur Dioxide
T	tons
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material
wt. %	Weight Percent
yr	year

### 3.0 INSIGNIFICANT ACTIVITIES

#### 3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

- 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a) (1) and 201.211, as follows:

Flexographic ink blending operation and wax treaters that would not emit more than 1 lb/hour of any regulated pollutant not listed as hazardous pursuant to Section 112(b) of the Clean Air Act in the absence of air pollution control equipment; would not emit more than 0.1 lb/hr of any regulated pollutant listed as hazardous pursuant to Section 112(b) of the Clean Air Act in the absence of air pollution control equipment; and is not a process unit.

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a) (2) or (a) (3), as follows:

Diesel Driven Fire Water Pump  
Plastic Printing Ink Preparation  
Parts Washers  
Cup Machines  
Regrind Process Lines  
Fugitive Emissions from Traffic

- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a) (4) through (18), as follows:

Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a) (4)].

Extruders used for the extrusion of metals, minerals, plastics, rubber, or wood, excluding extruders used in the manufacture of polymers, provided that volatile organic materials or class I or II substances subject to the requirements of Title VI of

the CAA are not used as foaming agents or release agents or were not used as foaming agents in the case of extruders processing scrap material [35 IAC 201.210(a)(5)].

Die casting machines where a metal or plastic is formed under pressure in a die.

Gas turbines and stationary reciprocating internal combustion engines of between 112 kW and 1,118 kW (150 and 1,500 horsepower) power output that are emergency or standby units [35 IAC 201.210(a)(16)].

Storage tanks of any size containing exclusively soaps, detergents, surfactants, glycerin, waxes, vegetable oils, greases, animal fats, sweeteners, corn syrup, aqueous salt solutions, or aqueous caustic solutions, provided an organic solvent has not been mixed with such materials [35 IAC 201.210(a)(17)].

Loading and unloading systems for railcars, tank trucks, or watercraft that handle only the following liquid materials, provided an organic solvent has not been mixed with such materials: soaps, detergents, surfactants, lubricating oils, waxes, glycerin, vegetable oils, greases, animal fats, sweetener, corn syrup, aqueous salt solutions, or aqueous caustic solutions [35 IAC 201.210(a)(18)].

3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

### 3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.

3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.

3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

### 3.3 Addition of Insignificant Activities

3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).

3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.

3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).



#### 4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
Unit 01	Flexographic Paperboard Press 28 2 Gas Dryers	1997	None
	Flexographic Paperboard Press 29 - 34 Gas Dryer	1972	None
	Flexographic Paperboard Press 35 Gas Dryer	1979	None
	Flexographic Paperboard Press 156 Electric Dryer	1993	None
	Flexographic Paperboard Press 36 and 37 Electric Dryer	1988	None
	Flexographic Spiral Wound Press 38 and 39 Gas Dryer	'74, '78	None
	Flexographic Tab Lid Press 148 and 149 Gas Dryer	1972	None
	Flexographic Straw Wrapper Press 63 - 70 No Dryer	1972	None
Unit 02	Lithographic Plastic Presses 90 & 91	1995	None
	Lithographic Plastic Presses 92-95, 97-101	'85, '77, '82, '91, '86, '85, '76	None
	Lithographic Plastic Press 96, 103, 109	1985, 1995, 1977	None
	Lithographic Plastic Press 104	1991	None
	Lithographic Plastic Presses 102, 105-108, 110, 111, 154, 155	'96, '76, '86, '79, '85, '77 '76, '77	None
	Lithographic Plastic Presses 112 (Polytype America), 113 and 114 (Van Dam)	1999 2000	None
Unit 03	69 Paper Cup and Container Forming Machines	1972	None
	2 Spiral Wound Tube Forming Machines	1972	None
	3 Paper Straw Forming Machines	1972	None
	6 Spiral Wound Lid Forming Machines	1972	None
Unit 04	8 Scrap Separators	1972	8 Cyclones
Unit 05	No. 1 Cleaver Brooks 8.4 mmBtu/hr	1968	None
	No. 2 Cleaver Brooks 12.5 mmBtu/hr	1968	None
	No. 3 Cleaver Brooks 12.5 mmBtu/hr	1968	None
	No. 4 Stone Johnson 12.5 mmBtu/hr	1968	None
Unit 06	37 Resin Pellet Handling Systems	1972	Filters

## 5.0 OVERALL SOURCE CONDITIONS

### 5.1 Source Description

- 5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM emissions.
- 5.1.2 This permit is issued based on the source not being a major source of HAPs.

### 5.2 Applicable Regulations

- 5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.
- 5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:
  - a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.
  - b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.
  - c. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2,000 ppm [35 IAC 214.301].
- 5.2.3 The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:
  - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

#### 5.2.4 Risk Management Plan

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

- 5.2.5 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.
- b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

#### 5.2.7 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the

Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.

- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:
  - i. Illinois EPA, Compliance Section; and
  - ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or
  - iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

### 5.3 Non-Applicability of Regulations of Concern

- a. This permit is issued based on the source not being subject to 40 CFR 63, Subpart KK, because the source is not a major source of HAPs. (See also Condition 5.5.2.)
- b. This permit is issued based on none of the affected units in this permit being subject to 40 CFR 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources because none of the affected units have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

### 5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

## 5.5 Source-Wide Emission Limitations

### 5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

#### Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	96.18
Sulfur Dioxide (SO <sub>2</sub> )	0.12
Particulate Matter (PM)	12.10
Nitrogen Oxides (NO <sub>x</sub> )	24.77
HAP, not included in VOM or PM	---
Total	133.17

### 5.5.2 Emissions of Hazardous Air Pollutants

The emissions of HAPs from the source shall be less than 10 tons/year for each individual HAP and 25 tons/year for all HAPs combined. Compliance with these limits shall be based on a running total of 12 months of data, with emissions calculated using standard USEPA methodology, e.g., by appropriately summing the product of the weight percent of each HAP in the organic material emissions for each organic liquid and the organic material emissions attributable to the storage and handling of that liquid, as determined by the current version of the TANKS program. This condition is being imposed at the request of the Permittee so that the source is not a major source of HAP emissions and the requirements of 40 CFR 63 Subpart KK - National Emission Standards for Hazardous Air Pollutants (NESHAP) does not apply to the source.

### 5.5.3 Other Source-Wide Emission Limitations

VOM Emissions Summary (Tons/Year)			
Source	Proposed (Potential)	Existing (Actual)	Net (Increase/ Decrease)
Flexo Press 28	12.23		+ 12.23
Existing Press 28	Removed	3.30	- 3.30
Litho Presses 90, 91, 102, 103	6.8		+ 6.8
Totals:	19.03	3.30	15.73

The netting limits on VOM ensure that the construction and/or modification does not constitute a new major source or major modification pursuant to 35 IAC Part 203. See Condition 7.1.6 and 7.2.6.

## 5.6 General Recordkeeping Requirements

### 5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7) (b) of the Act:

Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.

### 5.6.2 Records for VOM and HAP Emissions

The Permittee shall maintain records of the following items to verify that the source is not a major source for HAP emissions and therefore not subject to 40 CFR 63, Subpart KK, and to quantify annual VOM emissions, so as to demonstrate compliance with the limits in Condition 5.5.2:

- a. Records maintained on a monthly basis for the previous month:
  - i. Total usage of each individual HAP, and total combined HAPs from the source, tons/month and tons/year; and
  - ii. Total emissions of each individual HAP, and total combined HAPs from the source, tons/month and tons/year, with supporting calculations.

### 5.6.3 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

## 5.7 General Reporting Requirements

### 5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations of the source with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

### 5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

### 5.7.3 Annual Reporting of HAP Emissions

The Permittee shall submit an annual report to the Illinois EPA, Compliance Section, on HAP emissions from the source, including the following information, so as to demonstrate whether the source is being operated as a non-major source of HAP emissions. This report shall be submitted with the Annual Emissions Report (Condition 9.7).

- a. The annual emissions of individual HAPs for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total of Condition 5.5.2, tons/year (e.g., for the month of January, the emissions from February of the preceding calendar year through January; for the month of February, the emissions from March of the preceding calendar year through February; 12 months in all); and
- b. The total emissions of all HAPs combined for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total of Condition 5.5.2, tons/year (e.g., for the month of January, the emissions from February of the preceding calendar year through January; for the month of February, the emissions from March of the preceding calendar year through February; 12 months in all).

## 5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

## 5.9 General Compliance Procedures

### 5.9.1 General Procedures for Calculating VOM Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and Compliance Procedures in Section 7 (Unit Specific Conditions) of this permit.

- a. For the purpose of estimating HAP emissions from equipment at the source, the vapor weight percent (based on a 1992 USEPA survey) of each HAP for each product times the VOM emissions contributed by that product is acceptable.



## 6.0 EMISSION REDUCTION MARKET SYSTEM (ERMS)

### 6.1 Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to further reasonable progress toward attainment, as required by Section 182(c) of the Clean Air Act.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Once the ERMS begins, participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set during initial issuance of the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emission reduction from stationary sources required for further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source shall have sufficient ATUs in its account to cover its actual VOM emissions during the preceding season. An account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the account database. The Illinois EPA will then retire ATUs in sources' accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emission reductions from an Emission Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the Alternative Compliance Market Account (35 IAC 205.710). Sources may also transfer or sell the ATUs that they holds to other sources or participants (35 IAC 205.630).

### 6.2 Applicability

This source is considered a "participating source" for purposes of the ERMS, 35 IAC Part 205.

### 6.3 Obligation to Hold Allotment Trading Units (ATUs)

- a. Pursuant to 35 IAC 205.150(c)(1) and 205.720, and as further addressed by condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than its VOM emissions during the preceding seasonal allotment period (May 1 - September 30) not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.4.
  - i. VOM emissions from insignificant units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
  - ii. Excess VOM emissions associated with startup, malfunction or breakdown of an emission unit as authorized elsewhere in this permit, in accordance with 35 IAC 205.225;
  - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
  - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
  - v. VOM emissions from certain new and modified emission units as addressed by Section 6.7(b), if applicable, in accordance with 35 IAC 205.320(f).
- b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

### 6.4 Market Transaction

- a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).
- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).

- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).
- d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA in accordance with 35 IAC 205.620 and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

#### 6.5 Emission Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, it shall provide emissions excursion compensation in accordance with the following:

- a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by notice, as follows:
  - i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
  - ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emission excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.
- c. Pursuant to 35 IAC 205.720(c), within 15 days of receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

#### 6.6 Quantification of Seasonal VOM Emissions

- a. The methods and procedures specified in Section 5 and 7 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.650(a), and shall be submitted in accordance with the following:
  - i. An initial emergency condition report within two days of the time when such excess emissions occurred due to the emergency; and
  - ii. A final emergency condition report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

#### 6.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emission Report, seasonal VOM emission information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:
  - i. Actual seasonal emissions of VOM from the source;
  - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;
  - iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in Section 205.337 of this Subpart;
  - iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Agency;
  - v. If a source's baseline emissions have been adjusted due to a variance, consent order or CAAPP permit compliance schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and
  - vi. If a source is operating a new or modified emission unit for which three years of operational data are not yet available, as specified in 35 IAC 205.320(f),

the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.

- b. This report shall be submitted by October 31 of each year, for the preceding seasonal allotment period.

6.8 Allotment of ATUs to the Source

- a.
  - i. The allotment of ATUs to this source is 191 ATUs per seasonal allotment period.
  - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 21.52 tons.
  - iii. The source's allotment reflects 88% of the baseline emissions (12% reduction) except for the VOM emissions from specific emission unit excluded from such reduction, pursuant to 35 IAC 205.405 including units complying with MACT or using BAT, as identified in Section 7 of this permit.
  - iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.
  - v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.
- b. Contingent Allotments for New or Modified Emission Units  
Not applicable.
- c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:
  - i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;
  - ii. Deduction of ATUs as a consequence of emission excursion compensation, in accordance with 35 IAC 205.720; and
  - iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

#### 6.9 Recordkeeping for ERMS

The Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of ERMS [35 IAC 205.700(a)]:

- a. Seasonal component of the Annual Emission Report;
- b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

#### 6.10 Exclusions from Further Reductions

- a. VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following [35 IAC 205.405(a)]:

- i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;
- ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units, and internal combustion engines; and
- iii. An emission unit for which a LAER demonstration has been approved by the Illinois EPA on or after November 15, 1990.

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.405(a) and (c)]:

None

- b. VOM emissions from emission units using BAT for controlling VOM emissions shall not be subject to the VOM emissions reductions requirement specified in 35 IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT [35 IAC 205.405(b)].

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 IAC 205.405(b) and (c)]:

None

## 7.0 UNIT SPECIFIC CONDITIONS

### 7.1 Unit 01: Flexographic Printing Presses Control: None

#### 7.1.1 Description

17 flexographic presses are used to print on plain or plastic coated paperboard that is used to manufacture the various cups, containers, and lids produced. There are an additional 8 presses that are used for straw wrapper printing. Each press utilizes compliant ink which is cured in a dryer (3 electric and 14 natural gas fired). Two of the presses also have a flame treater to prepare the paper for printing. The use of propylene glycol ether for cleaning the presses is also included.

#### 7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Flame Treater
Unit 01	Flexographic Paperboard Press 28 2 Gas Dryers	Yes
	Flexographic Paperboard Press 29 - 34 Gas Dryer	Press 2
	Flexographic Paperboard Press 35 Gas Dryer	Yes
	Flexographic Paperboard Press 156 Electric Dryer	No
	Flexographic Paperboard Press 36 and 37 Electric Dryer	Press 11
	Flexographic Spiral Wound Press 38 and 39 Gas Dryer	None
	Flexographic Tab Lid Press 148 and 149 Gas Dryer	None
	Flexographic Straw Wrapper Press 63 - 70 No Dryer	None

#### 7.1.3 Applicability Provisions and Applicable Regulations

- a. Each printing press is an "affected printing line" for purposes of these unit-specific conditions.
- b. The affected printing lines are subject to 35 IAC 212.321(a), which requires that:
  - i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or

after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].

- ii. The emissions of particulate matter into the atmosphere in any one hour period from each of the affected paint spray booths shall not exceed the allowable emission rates specified in the following equation

$$E = A(P)^B$$

Where:

P = Process weight rate; and,  
E = Allowable emission rate; and,

- 1. For process weight rates up to 408 MG/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

Where:

P = Process weight rate in metric or English tons per hour, and

E = Allowable emission rate in kilograms or pounds per hour.

[35 IAC 212.321]

- c. No owner or operator of an affected printing line shall apply at any time any coating or ink unless the VOM content does not exceed the limitation specified in either subsection (c)(i) or (c)(ii) below. Compliance with this Section must be demonstrated through the applicable coating or ink analysis test methods and procedures specified in 35 IAC 218.105(a) and the recordkeeping and reporting requirements specified in 35 IAC 218.404(c).
  - i. Forty percent VOM by volume of the coating and ink (minus water and any compounds which are specifically exempted from the definition of VOM), or
  - ii. Twenty-five percent VOM by volume of the volatile content in the coating and ink.



- d. Each affected material handling system is subject to the emission limits identified in Condition 5.2.2.

#### 7.1.4 Non-Applicability of Regulations of Concern

- a. Affected printing lines are not subject to 35 IAC 218.301, Use of Organic Material, pursuant to 35 IAC 218.401(b), which excludes the affected printing lines from these requirements.
- b. The affected printing lines are not subject to 35 IAC 218.204(c), coating operations-Paper coating, as the paper coating limitation does not apply to a line on which printing is performed which complies with the emission limitations in 35 IAC 218.401 [35 IAC 218.204(c)].
- c. The New Source Performance Standard for Publication Rotogravure Printing, 40 CFR Subpart QQ, applies to units constructed, modified, or reconstructed after October 28, 1980. The presses at this source do not meet the definition for a publication rotogravure printing press, which means any number of rotogravure printing units capable of printing simultaneously on the same continuous web or substrate and includes any associated device for continuously cutting and folding the printed web, where the following saleable paper products are printed. Therefore this regulation does not apply.
- d. The National Emission Standard for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63 Subpart KK, applies to sources which are major for emissions of HAP. This source is not a major source of HAPs and therefore is only required to keep records of HAP emissions. (see also Condition 5.5)

#### 7.1.5 Control Requirements

Each affected printing line shall only be operated with natural gas as the fuel in the press dryers.

#### 7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected printing lines are subject to the following:

Material Usage and VOM emissions from flexographic press 28 shall not exceed the following limits:

<u>Material</u>	<u>Usage</u>		<u>VOM Content</u> (Wt. %)	<u>VOM Emissions</u>	
	(T/Mo)	(T/Yr)		(T/Mo)	(T/Yr)
Printing Ink	15.5	180	6.7	1.04	12.23

The above limitations were established in Construction Permit 97070093, pursuant to 35 IAC Part 203. These limits ensure that the construction/modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to 35 IAC Part 203. [T1]

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

The cleaning solution used on flexographic press #28 shall contain no VOM.

#### 7.1.7 Testing Requirements

Testing for VOM content of inks and other printing materials shall be performed as follows [35 IAC 218.105(a), 218.211(a), and Section 39.5(7)(b) of the Act]:

- a. On at least an annual basis:
  - i. The VOM content of representative inks and coatings "as applied" on affected printing lines shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a).
  - ii. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition 7.1.9(b) directly reflect the application of such material and separately account for any additions of solvent.
  - iii. Upon written request from the Permittee, the Illinois EPA may waive this requirement on a year-by-year basis, if prior testing shows a margin of compliance and no significant changes in coating supplies have occurred.
- b. Upon reasonable request by the Illinois EPA, the VOM content of specific inks, coatings, and cleaning solvents used on affected printing lines shall be determined according to USEPA Reference Methods 24

and 24A of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a) [35 IAC 218.105(a) and 218.404(a)].

7.1.8 Inspection Requirements

None

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected printing lines to demonstrate compliance with conditions 5.5.1, 7.1.3, and 7.1.6, pursuant to Section 39.5(7)(b) of the Act:

- a. The name and identification number of each coating and ink as applied on the flexographic printing lines;
- b. The usage of each coating, ink and solvent in gallons or pounds on a monthly basis;
- c. The VOM content of each coating, ink and solvent in pounds per gallon or pound per pound;
- d. The most recent emissions test report for each coating line.
- e. Records shall be maintained of the VOM content of each cleaning solvent used on the affected printing lines as follows:
  - i. The VOM content of these materials, lb VOM/gal with source of data, i.e., as determined from material safety data sheets, manufacturer specifications, process formulation data, and/or testing using USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A;
  - ii. Records of material consumption shall be maintained for each cleaning solvent used on the affected printing lines on a monthly basis; and
  - ii. Records of reclaimed cleaning solvent on a monthly basis.
- f. Natural gas usage for the affected printing lines, mmft<sup>3</sup>/mo and mmft<sup>3</sup>/yr;
- g. Monthly and the aggregate annual VOM emissions from the affected printing lines, with supporting calculations; and

- h. Monthly and annual aggregate NO<sub>x</sub>, PM, SO<sub>2</sub>, and VOM emissions from the combustion of natural gas-fired dryers from the affected printing lines shall be maintained, based on the operating schedule, fuel usage, and the applicable emission factors, with supporting calculations.

#### 7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations of an affected printing line with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. Any record showing violation of Condition 7.1.3(d) (35 IAC 218.401(a)) shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation [35 IAC 218.404(c)(3)(A)].
- b. Pursuant to 35 IAC 218.404(c)(3)(B) and 35 IAC 218.404(c)(1) at least 30 calendar days before changing the method of compliance with Section 218.401 of this Part from Section 218.401(a) of this Part to Section 218.401(b) or (c) of this Part, the owner or operator shall comply with all requirements of subsection (d)(1) or (e)(1) of this Section, respectively. Upon changing the method of compliance with Section 218.401 of this Part from Section 218.401(a) of this Part to Section 218.401(b) or (c) of this Part, the owner or operator shall comply with all requirements of subsection (d) or (e) of this Section, respectively.
- c. Emissions of PM from the affected printing lines in excess of the limits specified in Condition 7.1.3(b) based on the operating rate and emission factor in Condition 7.1.12 within 30 days of such an occurrence.

#### 7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

#### 7.1.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.1.9 and the emission factors and formulas listed below:

- a. To determine compliance with Condition 5.5.1, emissions from the affected printing lines shall be calculated based on the following:

$$\text{Ink VOM emissions} = [\text{Ink and Coating VOM consumption} \times \text{Ink and Coating VOM Content}]$$

$$\text{Cleaning Solvent VOM Emissions} = \text{Cleaning Solvent VOM Consumption}$$

$$\text{Reclaimed Solvent Emissions} = \text{Reclaimed Solvent (tons)} \times \text{VOM content (wt. \%)}$$

$$\text{Total VOM Emissions} = \text{Ink VOM Emissions} + \text{Cleaning Solvent VOM emissions} - \text{Reclaimed Solvent Emissions}$$

- b. Compliance with Condition 7.1.3(c) is assured to be achieved by the work-practices inherent in operation of natural gas-fired dryers.
- c. To determine compliance with Condition 5.5.1, emissions from the dryers of affected printing lines shall be calculated based on the following emission factors and formulas:

<u>Pollutant</u>	<u>Natural Gas Emission Factor (lb/mmft<sup>3</sup>)</u>
NO <sub>x</sub>	100
PM	11.9
SO <sub>2</sub>	0.6
VOM	2.8

Where emission factors for NO<sub>x</sub>, PM, SO<sub>2</sub> and VOM for uncontrolled natural gas combustion in commercial boilers (0.3 - < 10 mmBtu/hr), Tables 1.4-1, 1.4-2, and 1.4-3, AP-42, Volume I, Supplement F, October, 1996. VOM emission factor based on TOC factor corrected for 34% methane contribution.

$$\text{Dryer Emissions (lb)} = (\text{natural gas consumed, mmft}^3) \times (\text{the appropriate emission factor, lb/mmft}^3)$$

7.2 Unit 02: Non-Heatset Lithographic Printing Presses  
Control: None

7.2.1 Description

Plastic and specified paper printing is performed on a number of non-heatset offset lithographic printing presses. These presses use ultraviolet (UV) cured inks, infrared (IR) cured inks, and no fountain solutions. Many of the presses have flame treaters that prepare the plastic for printing. The use of propylene glycol ether for cleaning the presses is also included.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Flame Treater
Unit 02	Lithographic Plastic Presses 90 & 91	Yes
	Lithographic Plastic Presses 92-95, 97-101	Yes
	Lithographic Plastic Press 96, 103, 109	No
	Lithographic Plastic Press 104	Yes
	Lithographic Plastic Presses 102, 105-108, 110, 111, 154	Yes
	Lithographic Plastic Presses 112 (Polytype America), 113 and 114 (Van Dam)	Yes

7.2.3 Applicability Provisions and Applicable Regulations

- a. Each printing press is an "affected printing line" for purposes of these unit-specific conditions.
- b. The affected printing lines are subject to 35 IAC 212.321(a), which requires that:
  - i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
  - ii. The emissions of particulate matter into the atmosphere in any one hour period from each of the affected paint spray booths shall not exceed the allowable emission rates specified in the following equation

$$E = A (P)^B$$

Where:

P = Process weight rate; and,

E = Allowable emission rate; and,

1. For process weight rates up to 408 MG/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

Where:

P = Process weight rate in metric or English tons per hour, and

E = Allowable emission rate in kilograms or pounds per hour.

[35 IAC 212.321]

- c. On and after March 15, 1996, no owner or operator of lithographic printing line(s) subject to the requirements of 35 IAC 218.407 shall:

- i. Cause or allow the operation of any non-heatset web offset lithographic printing line unless the VOM content of the as-applied fountain solution is 5 percent or less, by volume, and the as-applied fountain solution contains no alcohol;

- ii. Cause or allow the use of a cleaning solution on any lithographic printing line unless:

- A. The VOM content of the as-used cleaning solution is less than or equal to 30 percent, by weight; or

- B. The VOM composite partial vapor pressure of the as-used cleaning solution is less than 10 mmHg at 20°C (68°F);

- iii. Cause or allow VOM containing cleaning materials, including used cleaning towels, associated with any lithographic printing line to be kept, stored or disposed of in any manner other than in closed containers.

[35 IAC 218.407]

- d. Affected printing lines are subject to 35 IAC 218.301, Use of Organic Material, No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303, or 218.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 218 Subpart G shall only apply to photochemically reactive material [35 IAC 218.301].
- e. Each affected printing line is subject to the emission limits identified in Condition 5.2.2.

#### 7.2.4 Non-Applicability of Regulations of Concern

- a. The affected printing lines are not subject to 35 IAC 218.204(c), coating operations-Paper coating, as the paper coating limitation does not apply to a line on which printing is performed which complies with the emission limitations in 35 IAC 218.401 [35 IAC 218.204(c)].
- b. This permit is issued based on the affected presses not being subject to National Emission Standard for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR Part 63, Subpart KK, because the affected presses are not located at a major source for hazardous air pollutants.
- c. This permit is issued based on the affected presses not being subject to the New Source Performance Standards (NSPS) for Publication Rotogravure Printing, 40 CFR 60, Subpart QQ, because the affected presses do not meet the definition of a publication rotogravure printer.

#### 7.2.5 Control Requirements

None

#### 7.2.6 Emission Limitations

- a. i. Emissions from the affected printing presses 90, 91, 102, 103 and 112 (Polytrope America) shall not exceed the following limits:

	Material Usage		VOM Content	VOM Emissions	
<u>Material</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>(Wt. %)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>
Printing Ink	0.44	5.20	5.0	0.01	0.02
Cleaning Solvent	0.70	8.30	100	<u>0.35</u>	<u>4.15</u>
Totals:				0.36	4.17



These limits are based on material balance of material usage and maximum VOM content.

- ii. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
  - iii. The above limitations are established, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification of lithographic presses 90, 91, 102, & 103 did not constitute a new major source or major modification pursuant to 35 IAC Part 203. [T1]
- b. i. Emissions from the affected Van Dam presses (113 and 114 combined) shall not exceed the following limits:

VOM Emissions	
<u>(Ton/Month)</u>	<u>(Ton/Year)</u>
0.5	4.4

These limits are based on the maximum ink and clean-up solvent usage and the maximum VOM content of each material.

- ii. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

The above limitations were established in Construction Permit 00050077, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

#### 7.2.7 Testing Requirements

- a. Testing to demonstrate compliance with the VOM content limitations in Section 7.2.3(c), and to determine the VOM content of fountain solutions, fountain solution additives, cleaning solvents, cleaning solutions, and inks (pursuant to the requirements of 35 IAC 218.411(a)(1)(B)), shall be conducted upon request of the Agency, as follows:

- i. The applicable test methods and procedures specified in 35 IAC 218.105(a) shall be used; provided, however, Method 24, incorporated by reference at 35 IAC 218.112, shall be used to demonstrate compliance; or
  - ii. The manufacturer's specifications for VOM content for fountain solution additives, cleaning solvents, and inks may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 IAC 218.105(a); provided, however, Method 24 shall be used to determine compliance.
- b. Testing to determine the VOM composite partial vapor pressure of cleaning solvents, cleaning solvent concentrates, and as-used cleaning solutions shall be conducted in accordance with the applicable methods and procedures specified in 35 IAC 218.110.

#### 7.2.8 Inspection Requirements

- a. The owner or operator of any lithographic printing line relying on the VOM content of the cleaning solution to comply with 35 IAC 218.407(a) (4) (A) must:
  - i. For cleaning solutions that are prepared at the source with equipment that automatically mixes cleaning solvent and water (or other non-VOM):
    - A. Install, operate, maintain, and calibrate the automatic feed equipment in accordance with manufacturer's specifications to regulate the volume of each of the cleaning solvent and water (or other non-VOM), as mixed; and
    - B. Pre-set the automatic feed equipment so that the consumption rates of the cleaning solvent and water (or other non-VOM), as applied, comply with 35 IAC 218.407(a) (4) (A);
  - ii. For cleaning solutions that are not prepared at the source with automatic feed equipment, keep records of the usage of cleaning solvent and water (or other non-VOM) as set forth in 35 IAC 218.411(d) (2).

- b. The owner or operator of any lithographic printing line relying on the vapor pressure of the cleaning solution to comply with 35 IAC 218.407(a)(4)(B) must keep records for such cleaning solutions used on any such line(s) as set forth in 35 IAC 218.411(d)(2)(C).

[35 IAC 218.410(e)]

#### 7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected printing line to demonstrate compliance with conditions 5.5.1 and 7.2.3, pursuant to Section 39.5(7)(b) of the Act:

- a. For lithographic printing line cleaning operations, an owner or operator of a lithographic printing line subject to the requirements of 35 IAC 218.407 shall:
  - i. By March 15, 1996, or upon initial start-up of a new lithographic printing line, certify to the Agency that all cleaning solutions, and the handling of cleaning materials, will be in compliance with the requirements of 35 IAC 218.407(a)(4)(A) or (a)(4)(B) and (a)(5), and such certification shall also include:
    - A. Identification of each VOM-containing cleaning solution used on each lithographic printing line;
    - B. The limitation with which each VOM-containing cleaning solution will comply, i.e., the VOM content or vapor pressure;
    - C. Initial documentation that each VOM-containing cleaning solution will comply with the applicable limitation, including copies of manufacturer's specifications, test results, if any, formulation data and calculations;
    - D. Identification of the method that will be used to demonstrate continuing compliance with the applicable limitations;
    - E. A sample of the records that will be kept pursuant to Section 218.411(d)(2) of this Subpart; and
    - F. A description of the practices that assure that VOM-containing cleaning materials are kept in closed containers;

- ii. On and after March 15, 1996, collect and record the following information for each cleaning solution used on each lithographic printing line:
  - A. For each cleaning solution for which the owner or operator relies on the VOM content to demonstrate compliance with 35 IAC 218.407(a)(4)(A) and which is prepared at the source with automatic equipment:
    - 1. The name and identification of each cleaning solution;
    - 2. The VOM content of each cleaning solvent in the cleaning solution, as determined in accordance with Section 218.409(c) of this Subpart;
    - 3. Each change to the setting of the automatic equipment, with date, time, description of changes in the cleaning solution constituents (e.g., cleaning solvents), and a description of changes to the proportion of cleaning solvent and water (or other non-VOM);
    - 4. The proportion of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution;
    - 5. The VOM content of the as-used cleaning solution, with supporting calculations; and
    - 6. A calibration log for the automatic equipment, detailing periodic checks;
  - B. For each batch of cleaning solution for which the owner or operator relies on the VOM content to demonstrate compliance with 35 IAC 218.407(a)(4)(A), and which is not prepared at the source with automatic equipment:
    - 1. The name and identification of each cleaning solution;

2. Date and time of preparation, and each subsequent modification, of the batch;
  3. The VOM content of each cleaning solvent in the cleaning solution, as determined in accordance with 35 IAC 218.409(c);
  4. The total amount of each cleaning solvent and water (or other non-VOM) used to prepare the as-used cleaning solution; and
  5. The VOM content of the as-used cleaning solution, with supporting calculations;
- C. For each batch of cleaning solution for which the owner or operator relies on the vapor pressure of the cleaning solution to demonstrate compliance with 35 IAC 218.407(a) (4) (B) :
1. The name and identification of each cleaning solution;
  2. Date and time of preparation, and each subsequent modification, of the batch;
  3. The molecular weight, density, and VOM composite partial vapor pressure of each cleaning solvent, as determined in accordance with 35 IAC 218.409(e);
  4. The total amount of each cleaning solvent used to prepare the as-used cleaning solution;
  5. The VOM composite partial vapor pressure of each as-used cleaning solution, as determined in accordance with 35 IAC 218.409(e);
  6. The total amount of reclaimed cleaning solvent; and
  7. VOM content of the reclaimed cleaning solvent.
- D. The date, time and duration of scheduled inspections performed to confirm the proper use of closed containers to control VOM emissions, and any instances

of improper use of closed containers,  
with descriptions of actual practice and  
corrective action taken, if any.

- iii. Monthly and annual aggregate VOM emissions from the affected printing lines, with supporting calculations. These emissions may be kept in aggregate except for cases in which individual or small group limits in Condition 7.2.6 exist.
- b. The owner or operator shall maintain all records required by this Section at the source for a minimum period of three years and shall make all records available to the Agency upon request.

#### 7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations of the affected printing lines with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. On and after March 15, 1996, notify the Agency in writing of any violation of 35 IAC 218.407 within 30 days after the occurrence of such violation. Such notification shall include a copy of all records of such violation; and
- b. If changing its method of demonstrating compliance with the requirements of 35 IAC 218.407(a)(4), or changing between automatic and manual methods of preparing cleaning solutions, certify compliance for such new method in accordance with subsection (a)(i) of this Section, within 30 days after making such change, and perform all tests and calculations necessary to demonstrate that such printing line(s) will be in compliance with the applicable requirements of 35 IAC 218.407(a)(4).
- c. Emissions of PM from the affected printing lines in excess of the limits specified in Condition 7.1.3(b) based on the operating rate and emission factor in Condition 7.1.12 within 30 days of such an occurrence.

#### 7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

#### 7.2.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.2.9 and the emission factors and formulas listed below:

- a. To determine compliance with Condition 5.5.1, emissions from the affected printing lines shall be calculated based on the following:

Ink VOM Emissions = [Ink VOM Consumption x Ink VOM Content x 0.05 (Retention Factor)]

Cleaning Solvent = [Cleaning Solvent VOM Consumption VOM Emissions x 0.5 (Retention Factor)]

Reclaimed Solvent Emissions = Reclaimed Solvent (tons) x VOM content (wt. %)

Total VOM emissions = Ink VOM Emissions + Cleaning Solvent VOM Emissions - Reclaimed Solvent Emissions

Retention factors for lithographic printing come from USEPA Alternative Control Techniques (ACT) document dated June 1994 and from 35 IAC 218 Subpart H.

- b. Compliance with Condition 7.2.3(c) is assured to be achieved by the work-practices inherent in operation of natural gas-fired dryers.
- c. To determine compliance with Condition 5.5.1, emissions from the dryers of affected printing lines shall be calculated based on the following emission factors and formulas:

<u>Pollutant</u>	Natural Gas Emission Factor (lb/mmft <sup>3</sup> )
NO <sub>x</sub>	100
PM	11.9
SO <sub>2</sub>	0.6
VOM	2.8

Where emission factors for NO<sub>x</sub>, PM, SO<sub>2</sub> and VOM for uncontrolled natural gas combustion in commercial boilers (0.3 - < 10 mmBtu/hr), Tables 1.4-1, 1.4-2, and 1.4-3, AP-42, Volume I, Supplement F, October, 1996. VOM emission factor based on TOC factor corrected for 34% methane contribution.

Dryer Emissions (lb) = (Natural Gas Consumed, mmft<sup>3</sup>) x (the Appropriate Emission Factor, lb/mmft<sup>3</sup>)

7.3 Unit 03: Gluing Operation  
Control: None

7.3.1 Description

Sweetheart Cup utilizes a water based adhesive to form paper cups and containers, spiral wound tubes and lids, and paper drinking straws. The adhesive is stored in a 6,000 gallon fiberglass storage tank. Glue is applied by 69 paper cup and container forming machines, 2 spiral wound tube forming machines, 6 spiral wound lid forming machines, and 3 paper straw forming machines.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Emission Unit Description	Emission Control Equipment
Unit 03	69 Paper Cup and Container Forming Machines	None
	2 Spiral Wound Tube Forming Machines	None
	3 Paper Straw Forming Machines	None
	6 Spiral Wound Lid Forming Machines	None

7.3.3 Applicability Provisions and Applicable Regulations

- a. The "affected gluing operation" for the purpose of these unit-specific conditions, is any of the three identical solvent joining units.
- b. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303, or 218.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 218 Subpart G shall only apply to photochemically reactive material [35 IAC 218.301].
- c. Each affected material handling system is subject to the emission limits identified in Condition 5.2.2.

7.3.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected gluing operation not being subject to 35 IAC 218 Subpart TT, Fabricated Product Manufacturing Processes, because the affected gluing operation does not meet the applicability of 35 IAC 218.960(a). In particular, the affected gluing operation has:



- a. Maximum theoretical emissions of VOM that are less than 90.7 Mg (100 tons) per year; and
- b. A potential to emit for VOM that is less than 22.7 Mg (25 tons) per year.

7.3.5 Operational and Production Limits and Work Practices

None

7.3.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.3.7 Testing Requirements

None

7.3.8 Monitoring Requirements

None

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected gluing operation to demonstrate compliance with Conditions 5.5.1, 7.3.3, and 7.3.6 pursuant to Section 39.5(7)(b) of the Act:

- a. Records of the adhesive usage for the affected gluing operation, gal/yr;
- b. The VOM content of the adhesive, % by wt;
- c. Density of adhesives, lb/gal;
- d. The cleanup solvent usage for the affected gluing operation, gal/yr;
- e. The VOM content of the cleanup solvent, % by wt;
- f. Density of cleanup solvent, lb/gal; and
- g. The aggregate monthly and annual VOM emissions from the affected gluing operation based on the adhesive and solvent usage, with supporting calculations.
- h. For compounds determined to be photochemically reactive, the hours of operation and hourly VOM emissions from the affected gluing operation based on the adhesive and solvent usage and operating hours, with supporting calculations.

#### 7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations of the affected gluing operation with the permit requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. Upon request by the Illinois EPA, the owner or operator of an emission unit which is exempt from the requirements of 35 IAC 218 Subpart PP, Fabricated Product Manufacturing Processes, shall submit records to the Illinois EPA within 30 calendar days from the date of the request that document that this emission unit is exempt from those requirements [35 IAC 218.990].
- b. Emissions of VOM from the affected gluing operation in excess of the limits specified in Condition 7.3.3 or 7.3.6 within 30 days of such an occurrence.

#### 7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

#### 7.3.12 Compliance Procedures

Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.3.9 and the emission factors and formulas listed below:

To determine compliance with Conditions 5.5.1, 7.3.3, and 7.3.6, VOM emissions from the affected gluing operation shall be calculated based on the following:

$$\text{Adhesive Emissions (lb)} = (\text{Adhesive Usage, gal}) \times (\text{Adhesive Density, lb/gal}) \times (\text{VOM Content of Adhesive, \% by wt.})$$

$$\text{Cleaning Emissions} = (\text{Cleaning Solvent Usage, gal}) \times (\text{Solvent Density, lb/gal})$$

$$\text{Total VOM Emissions} = \text{Adhesive Emissions} + \text{Cleaning Emissions}$$

Hourly emissions may be determined by dividing the calculated emissions by the operating hours of the gluing operation to determine compliance with Condition 7.3.3.

7.4 Unit 04: Scrap Separator System  
Control: 01 Cyclone

7.4.1 Description

Scrap paper in the form of trim or spoiled products is generated at various stages of the manufacturing process. The scrap paper is collected and transferred pneumatically to a baler where it may be shredded or baled directly. The source operates eight scrap systems controlled by cyclones.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Emission Unit Description	Emission Control Equipment
Unit 04	8 Scrap Separators	8 Cyclones

7.4.3 Applicability Provisions and Applicable Regulations

- a. The "affected scrap separator system" for the purpose of these unit-specific conditions, is any of the eight scrap separator systems.
- b. The affected scrap separator systems are subject to 35 IAC 212.322(a), which requires that:
  - i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced prior to April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)].
  - ii. The emissions of particulate matter into the atmosphere in any one hour period from each of the affected paint spray booths shall not exceed the allowable emission rates specified in the following equation

$$E = C + A (P)^B$$

Where:

P = Process weight rate; and,  
E = Allowable emission rate; and,

1. For process weight rates up to 408 MG/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.985	4.10
B	0.67	0.67
C	0	0

Where:

P = Process weight rate in metric or English tons per hour, and

E = Allowable emission rate in kilograms or pounds per hour.

[35 IAC 212.322]

- c. Each affected material handling system is subject to the emission limits identified in Condition 5.2.2.

#### 7.4.4 Non-Applicability of Regulations of Concern

N/A

#### 7.4.5 Control Requirements

The Permittee shall operate, maintain, and replace the dust collector filters in a manner that assures compliance with the conditions of this section.

#### 7.4.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

#### 7.4.7 Operating Requirements

All unloading and transporting operations of materials collected by pollution control equipment shall be enclosed or shall utilize spraying, pelletizing, screw conveying or other equivalent methods, pursuant to 35 IAC 212.307.

#### 7.4.8 Inspection Requirements

The Permittee shall visually inspect the filters and check the pressure drop on a regular basis in order to ensure proper operation of the dust collectors and the need for replacement.

#### 7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected scrap separators to demonstrate compliance with conditions 5.5.1 and 7.4.3, pursuant to Section 39.5(7)(b) of the Act:

- a. Inlet flow rate and control efficiency of the dust collectors;
- b. A maintenance and repair log for each dust collector, listing each activity performed with date;
- c. Results of filter inspections and dates of replacements made;
- d. Process weight rate, ton/hr and ton/yr; and
- e. PM emissions including supporting calculations, lb/hr and ton/yr.

#### 7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations of the affected scrap separators with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

#### 7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

#### 7.4.12 Compliance Procedures

Compliance provisions addressing the particulate matter limitations in this section are not set by this permit as compliance is assumed to be achieved by the normal work-practices, proper operation, and maintenance activities of an affected woodworking operation.

7.5 Unit 05: Boilers

7.5.1 Description

The four boilers are used to provide heat to the building. The boilers operate on natural gas.

7.5.2 List of Emission Equipment and Pollution Control Equipment

Emission Unit	Description	Control Equipment
Unit 05 Boilers	No. 1 Cleaver Brooks 8.4 mmBtu/hr	None
	No. 2 Cleaver Brooks 12.5 mmBtu/hr	None
	No. 3 Cleaver Brooks 12.5 mmBtu/hr	None
	No. 4 Stone Johnson 12.5 mmBtu/hr	None

7.5.3 Applicability Provisions and Applicable Regulations

- a. An "affected boiler" for the purpose of these unit specific conditions is a fuel combustion unit that is fired with natural gas. As of the "date issued" as shown on page 1 of this permit, the affected boiler is identified in Condition 7.5.2.
- b. Affected boilers No. 2, 3, and 4 are subject to 35 IAC 216.121, No person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air.
- c. Each affected material handling system is subject to the emission limits identified in Condition 5.2.2.

7.5.4 Non-Applicability of Regulations of Concern

- a. Affected boiler No. 1 is not subject to 35 IAC 216.121, No person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air, since the firing rate is less than 10 mmBtu/hr.
- b. The New Source Performance Standard for Small-Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, applies to units constructed, reconstructed, or modified after June 9, 1989, with firing rates of 100 mmBtu/hr or less, but greater than 10 mmBtu/hr. The affected boilers were constructed before the date for which the NSPS would be applicable. Therefore, these rules do not apply.
- c. Affected boiler is not subject to 35 IAC 217.541, emissions of NO<sub>x</sub> from existing fuel combustion emission units in major metropolitan areas, because the actual heat input of each affected boiler is less than 73.2 MW (250 mmBtu/hr).

- d. Pursuant to 35 IAC 218.303, fuel combustion emission units are not subject to 35 IAC 218.301, Use of Organic Material.
- 7.5.5 Operational and Production Limits and Work Practices

Each affected boiler shall only be operated with natural gas as the fuel.
- 7.5.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.
- 7.5.7 Testing Requirements

None
- 7.5.8 Monitoring Requirements

None
- 7.5.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items to demonstrate compliance with Conditions 5.5.1 and 7.5.5 pursuant to Section 39.5(7)(b) of the Act:

  - a. Total natural gas usage for the boilers, therms/mo and therms/year; and
  - b. Monthly and annual aggregate NO<sub>x</sub>, PM, SO<sub>2</sub>, and VOM emissions from the affected boilers, based on fuel consumption and the applicable emission factors, with supporting calculations.
- 7.5.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations with applicable requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

  - a. Emissions of NO<sub>x</sub>, PM, SO<sub>2</sub>, or VOM from the affected boilers in excess of the limits specified in Condition 5.5.1 based on the current months records plus the preceding 11 months within 30 days of such an occurrence.
- 7.5.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

#### 7.5.12 Compliance Procedures

- a. Compliance with the emission limits in Conditions 5.5.1 and 5.5.3 shall be based on the recordkeeping requirements in Condition 7.5.9 and the emission factors and formulas listed below:

- i. Emissions from the affected boilers burning natural gas shall be calculated based on the following emission factors:

Emission Factor	
<u>Pollutant</u>	<u>(lb/10<sup>6</sup> ft<sup>3</sup>)</u>
PM	11.9
NO <sub>x</sub>	100
SO <sub>2</sub>	0.6
VOM	2.8

These are the emission factors for uncontrolled natural gas combustion in small industrial boilers (<10 mmBtu/hr), Tables 1.4-1, 1.4-2, and 1.4-3, AP-42, Volume I, Supplement F, October, 1996. VOM emission factor based on Total Organic Carbon (TOC) factor corrected for 52% methane.

- ii. Emissions from the affected boilers burning natural gas shall be calculated based on the following emission factors:

Emission Factor	
<u>Pollutant</u>	<u>(lb/10<sup>6</sup> ft<sup>3</sup>)</u>
PM	14
NO <sub>x</sub>	140
SO <sub>2</sub>	0.6
VOM	2.8

These are the emission factors for uncontrolled natural gas combustion in small industrial boilers (10 mmBtu/hr < Firing Rate < 100 mmBtu/hr), Tables 1.4-1, 1.4-2, and 1.4-3, AP-42, Volume I, Supplement F, October, 1996. VOM emission factor based on Total Organic Carbon (TOC) factor corrected for 52% methane.

Boiler Emissions (lb) = natural gas consumed multiplied by the appropriate emission factor.

Conversion factors of 1,000 Btu/ft<sup>3</sup> and 1 therm/100,000 Btu were used.



- b. Compliance provisions addressing the particulate matter limitations in Condition 7.5.3 are not set by this permit as compliance is assumed to be achieved by the normal work-practices, proper operation, and maintenance activities of an affected boiler.

7.6 Unit 06: Material Handling System  
Control: Filters

7.6.1 Description

Sweetheart Cup Co. uses pneumatic material conveying systems to transfer plastic resin pellets from railcar and bulk containers to storage silos and from the storage silos to various process equipment. Each of the material handling systems has a blower exhausting through a filter to control particulate matter.

7.6.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Unit 06	37 Resin Pellet Handling Systems	Filters

7.6.3 Applicability Provisions and Applicable Regulations

- a. An "affected material handling system" for the purpose of these unit-specific conditions, is a material handling system consisting of the equipment listed in Condition 7.6.2 controlled by a filter.
- b. The affected material handling systems are subject to 35 IAC 212.321(a), which requires that:
  - i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
  - ii. The emissions of particulate matter into the atmosphere in any one hour period from each of the affected paint spray booths shall not exceed the allowable emission rates specified in the following equation

$$E = A (P)^B$$

Where:

P = Process weight rate; and,

E = Allowable emission rate; and,

1. For process weight rates up to 408 MG/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

Where:

P = Process weight rate in metric or English tons per hour, and

E = Allowable emission rate in kilograms or pounds per hour.

[35 IAC 212.321]

- c. Each affected material handling system is subject to the emission limits identified in Condition 5.2.2.

#### 7.6.4 Non-Applicability of Regulations of Concern

N/A

#### 7.6.5 Control Requirements

The Permittee shall operate, maintain, and replace the dust collector filters in a manner that assures compliance with the conditions of this section.

#### 7.6.6 Emission Limitations

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

#### 7.6.7 Operating Requirements

All unloading and transporting operations of materials collected by pollution control equipment shall be enclosed or shall utilize spraying, pelletizing, screw conveying or other equivalent methods, pursuant to 35 IAC 212.307.

#### 7.6.8 Inspection Requirements

The Permittee shall visually inspect the filters and check the pressure drop on a regular basis in order to ensure proper operation of the dust collectors and the need for replacement.

#### 7.6.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected material handling system to demonstrate compliance with Conditions 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

- a. Inlet flow rate and control efficiency of the dust collectors;
- b. A maintenance and repair log for each dust collector, listing each activity performed with date; and
- c. Results of filter inspections and dates of replacements made.

#### 7.6.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of deviations of an affected material handling system with the permit requirements as follows, pursuant to Section 39.5(7)(f)(iii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

#### 7.6.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

#### 7.6.12 Compliance Procedures

Compliance provisions addressing the particulate matter limitations in this section are not set by this permit as compliance is assumed to be achieved by the normal work-practices, proper operation, and maintenance activities of an affected material handling system.

## 8.0 GENERAL PERMIT CONDITIONS

### 8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after December 18, 2003 (the date of issuance of the renewal draft permit) unless this permit has been modified to reflect such new requirements.

### 8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

### 8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

### 8.4 Operational Flexibility/Anticipated Operating Scenarios

#### 8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

#### 8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

- a. The changes do not violate applicable requirements;

- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;
- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:
  - i. Describe the physical or operational change;
  - ii. Identify the schedule for implementing the physical or operational change;
  - iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
  - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
  - v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

#### 8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

## 8.6 Reporting Requirements

### 8.6.1 Monitoring Reports

A report summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	September 1
July - December	March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

### 8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

#### 8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

#### 8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:

- i. Illinois EPA - Air Compliance Section

Illinois Environmental Protection Agency  
Bureau of Air  
Compliance Section (MC 40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

- ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
9511 West Harrison  
Des Plaines, Illinois 60016



iii. Illinois EPA - Air Permit Section (MC 11)

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Permit Section  
P.O. Box 19506  
Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

USEPA (AE - 17J)  
Air & Radiation Division  
77 West Jackson Boulevard  
Chicago, Illinois 60604

- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

## 9.0 STANDARD PERMIT CONDITIONS

### 9.1 Effect of Permit

- 9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].
- 9.1.2 In particular, this permit does not alter or affect the following:
  - a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
  - b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
  - c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
  - d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.
- 9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

### 9.2 General Obligations of Permittee

#### 9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

#### 9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

#### 9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

#### 9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

#### 9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

### 9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(p)(ii) of the Act]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- d. Sample or monitor any substances or parameters at any location:
  - i. At reasonable times, for the purposes of assuring permit compliance; or
  - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

#### 9.4 Obligation to Comply With Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

#### 9.5 Liability

##### 9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

##### 9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

##### 9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

##### 9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

#### 9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7) (o) (iv) of the Act].

### 9.6 Recordkeeping

#### 9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

#### 9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12) (b) (iv) of the Act].

#### 9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7) (e) (ii) of the Act].
- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

### 9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

### 9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7) (p) (v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be

submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

#### 9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

#### 9.10 Defense to Enforcement Actions

##### 9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

##### 9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
  - i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;

- ii. The permitted source was at the time being properly operated;
  - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
  - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

#### 9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

#### 9.12 Reopening and Reissuing Permit for Cause

##### 9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

##### 9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

#### 9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

#### 9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

#### 9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].



#### 9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(1), (n), and (o) of the Act].

## 10.0 ATTACHMENTS

### 10.1 Attachment 1 Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:

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Name:

---

Official Title:

---

Telephone No.:

---

Date Signed:

---

## 10.2 Attachment 2 - ERMS Baseline Emissions Summary

Seasonal VOM emissions from excluded units, in tons/season (TPS):

<u>Emission Unit</u>	<u>Proposed</u>	<u>Illinois EPA Determination</u>
Natural Gas Combustion Units	<u>0.1</u>	<u>0.1</u>
Subtotals	0.1	0.1

Seasonal VOM emissions from units subject to further reduction,  
in TPS:

<u>Emission Unit</u>	<u>Proposed</u>	<u>Illinois EPA Determination</u>
Nonheatset Lithographic Printing Presses	0.41	0.41
Flexographic Printing Presses	11.50	11.50
Solvent Parts Cleaning	<u>8.23</u>	<u>8.23</u>
Subtotals	21.52	21.52

1 ATU equals 200 lbs of VOM [35 IAC 205.130], or using standard conversion rate of 2000 lbs per ton, 10 ATU's equals 1 ton.

The source shall maintain records of actual seasonal VOM emissions for all emission units not considered insignificant activities in accordance with the recordkeeping and compliance procedures identified in the CAAPP permit starting with the 1998 seasonal allotment period of May 1 through September 30. The source shall submit the seasonal emissions information, as a component of the Annual Emissions Report by October 31 of each year, pursuant to 35 IAC 205.300.

Notes:

<p><b>TOTAL SOURCE ALLOTMENT = 0.1 + 0.88 x 21.52 = 19.0376</b></p> <p><b>OR 191 ATU</b></p>
--

Please note that claims of over compliance, under compliance and/or BAT may have been modified to reflect the requirements of the ERMS Program at 35 IAC 205.

### 10.3 Attachment 3 - Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;
2. Minor Permit Modification; and
3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment
  - Corrects typographical errors;
  - Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
  - Requires more frequent monitoring or reporting by the Permittee;
  - Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA. This shall be handled by completing form 272-CAAPP, REQUEST FOR OWNERSHIP CHANGE FOR CAAPP PERMIT; or
  - Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits.
2. Minor Permit Modification
  - Do not violate any applicable requirement;
  - Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
  - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
  - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA;
- Are not required to be processed as a significant permit modification; and
- Modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;
- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT for the Illinois EPA to use to notify USEPA and affected States.

### 3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;

- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or
- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms>.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.



Illinois Environmental Protection Agency  
Division Of Air Pollution Control -- Permit Section  
P.O. Box 19506  
Springfield, Illinois 62794-9506

<b>Application For Construction Permit (For CAAPP Sources Only)</b>	<b>For Illinois EPA use only</b>
	I.D. number:
	Permit number:
	Date received:

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

Source Information		
1. Source name:		
2. Source street address:		
3. City:	4. Zip code:	
5. Is the source located within city limits? <input type="checkbox"/> Yes <input type="checkbox"/> No		
6. Township name:	7. County:	8. I.D. number:

Owner Information		
9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

Operator Information (if different from owner)		
14. Name		
15. Address:		
16. City:	17. State:	18. Zip code:

Applicant Information	
19. Who is the applicant? <input type="checkbox"/> Owner <input type="checkbox"/> Operator	20. All correspondence to: (check one) <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Source
21. Attention name and/or title for written correspondence:	
22. Technical contact person for application:	23. Contact person's telephone number:

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Summary Of Application Contents	
24.	Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs: a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
25.	Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
26.	Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
27.	Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
28.	Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.
	<input type="checkbox"/> Yes <input type="checkbox"/> No
29.	If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?
	<input type="checkbox"/> Yes <input type="checkbox"/> No  <input type="checkbox"/> Not Applicable, No TRADE SECRET information in this application

Note 1: Answering "No" to any of the above may result in the application being deemed incomplete.

Signature Block	
This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.	
30. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete. Authorized Signature:	
BY:	
_____	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____ / _____ / _____
TYPED OR PRINTED NAME OF SIGNATORY	DATE

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source's CAAPP permit, if necessary.



10.5 Attachment 5 - Guidance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

1. A completed renewal application form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.
2. A completed compliance plan form 293-CAAPP, COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT.
3. A completed compliance certification form 296-CAAPP, COMPLIANCE CERTIFICATION, signed by the responsible official.
4. Any applicable requirements that became effective during the term of the permit and that were not included in the permit as a reopening or permit revision.
5. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.
6. Information addressing any outstanding transfer agreement pursuant to the ERMS.
7. a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. This letter must also include a statement that information incorporated by reference is also being certified for truth and accuracy by the responsible official's signing of the form 200-CAAPP, APPLICATION FOR CAAPP PERMIT and the form 296-CAAPP, COMPLIANCE CERTIFICATION. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.

- b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.
8. Information about all off-permit changes that were not prohibited or addressed by the permit to occur without a permit revision and the information must be sufficient to identify all applicable requirements, including monitoring, recordkeeping, and reporting requirements, for such changes.
9. Information about all changes made under 40 CFR 70.4(b)(12)(i) and (ii) that require a 7-day notification prior to the change without requiring a permit revision.

The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

Application forms may be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms.html>.

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

Mail renewal applications to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Permit Section (MC 11)  
P.O. Box 19506  
Springfield, Illinois 62794-9506